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9
10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 ENTROPIC COMMUNICATIONS, LLC,

13 Plaintiff,

14 v.

15 DISH NETWORK CORPORATION, *et*
16 *al.*,

17 Defendants.
18

19 ENTROPIC COMMUNICATIONS, LLC,

20 Plaintiff,

21 v.

22 COX COMMUNICATIONS, INC., *et al.*,

23 Defendants.
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27
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Case No.: 2:23-cv-01043-JWH-KES
(Lead Case)

Case No.: 2:23-cv-01047-JWH-KES
(Related Case)

Case No.: 2:23-cv-01048-JWH-KES
(Related Case)

Case No.: 2:23-cv-05253-JWH-KES
(Related Case)

[Assigned to the Honorable John W.
Holcomb]

**PLAINTIFF ENTROPIC'S
APPLICATION TO FILE
DOCUMENTS UNDER SEAL
REGARDING PLAINTIFF'S
RESPONSE TO COMCAST
DEFENDANTS' OBJECTION TO
SPECIAL MASTER ORDER NO.
SM-11; DECLARATION OF
CASSIDY T. YOUNG; [PROPOSED]
ORDER**

1 ENTROPIC COMMUNICATIONS, LLC,

2 Plaintiff,

3
4 v.

5 COMCAST CORPORATION, *et al.*,

6 Defendants.

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8 ENTROPIC COMMUNICATIONS, LLC,

9 Plaintiff,

10
11 v.

12 DIRECTV, LLC, *et al.*,

13 Defendants.

TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Pursuant to Central District of California Local Rule 79-5.2.2(a), Plaintiff Entropic Communications, LLC (“Entropic” or “Plaintiff”) hereby applies for an order sealing **unredacted** information referenced in Entropic’s Response to Comcast Defendants’ Objection to Special Master Order No. SM-11, which contains: (1) contents of documents designated as confidential by Defendant Comcast and (2) details related to a confidential agreement between Defendant Comcast and a third-party entity.

Each portion of the documents referenced in the chart below have been designated as confidential by Defendant Comcast or designed as confidential pursuant to agreements reached between third parties. (*See* Decl. of Cassidy T. Young in Support of Entropic’s Application to File Documents Under Seal, ¶ 4.) Entropic, therefore, applies to file such documents and information under seal pursuant to Local Rule 79-5.2.2(a).

The information to be sealed is identified below:

Item to be Sealed Pursuant to L.R. 79-5.2.2(a)	Description of Information
Portions of Entropic’s Response to Comcast Defendants’ Objection to Special Master Order No. SM-11 (“Response”) at 1:19–2:9.	Contents of documents designated as confidential by Defendant Comcast.
Portions of Entropic’s Response at 2:12–14.	Contents of documents designated as confidential by Defendant Comcast.
Portions of Entropic’s Response at 9:18–23.	Terms of confidential agreement between Comcast and a third-party entity.
Portion of Declaration of Cassidy T. Young in	Contents of documents designated as confidential by Defendant Comcast.

Support of Response at paragraph 3.	
Exhibit A to Declaration of Cassidy T. Young in Support of Response.	Contents of documents designated as confidential by Defendant Comcast.
Exhibit B to Declaration of Cassidy T. Young in Support of Response.	Contents of documents designated as confidential by Defendant Comcast.

Pursuant to Local Rule 79-5.2.2(a), Entropic applies to file under seal the documents listed above. Under Rule 79-5.2.2(a), a party may seek leave to file a document under seal so long as the Application describes the nature of the information that should be closed to public inspection and is accompanied by: (1) a declaration establishing good cause why the strong presumption of public access in civil cases should be overcome and informing the Court whether anyone opposes the Application; (2) a proposed order; (3) a redacted version of the relevant documents; and (4) an unredacted version of the relevant documents. Entropic has complied with these requirements. The information that Entropic seeks to seal is contained within: (1) contents of documents which Comcast designated confidential and (2) contents of Entropic's Second Amended Complaint discussing terms of a confidential agreement between Comcast and a third-party entity, which Entropic filed under seal. The public does not have an interest in accessing this confidential information. Additionally, Entropic's request is narrowly tailored to only prevent the public from viewing confidential information. Finally, counsel for Comcast indicated that it does not oppose Entropic's under seal filing.

Therefore, compelling reasons exist to seal the highlighted portions of the above documents. *See Aya Healthcare Servs., Inc. v. AMN Healthcare, Inc.*, 2020 WL 1911502, at *5 (S.D. Cal. Apr. 20, 2020) ("The Court agrees that compelling reasons

1 exist to seal references . . . to Defendants’ proprietary business records that detail
 2 sensitive financial terms, proprietary business strategies, and confidential negotiations
 3 and agreements with third parties.”); *In re Qualcomm Litig.*, 2019 WL 1557656, at *3
 4 (S.D. Cal. Apr. 10, 2019) (granting motions to seal “confidential business information
 5 of the parties, including trade secrets, proprietary business records, discussions of
 6 internal strategy, company dealings, and materials designated as ‘Highly
 7 Confidential’”).

8 Accordingly, Entropic respectfully requests that this Court order the unredacted
 9 documents to be filed under seal. Concurrent with this filing, Entropic has filed
 10 redacted versions of these documents with the Court, which only redact information
 11 necessary to protect confidential, private, and otherwise non-public information therein.

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 13 Dated: February 9, 2024

Respectfully Submitted,

14 By: /s/ Cassidy T. Young
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